

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
:
Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
:
Debtors. : (Jointly Administered)
:
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**ORDER GRANTING (NON-SUBSTANTIVE) OMNIBUS OBJECTION OF THE PLAN
ADMINISTRATOR, ON BEHALF OF THE DEBTORS, TO CERTAIN CLAIMS**

Upon the objection (the “Objection”)² of the Plan Administrator, on behalf of the above-caption debtors (collectively, the “Debtors”), for entry of an order (the “Proposed Order”) (i) disallowing and expunging in its entirety the Late Filed Claim identified on **Schedule 1** to the Proposed Order attached hereto and (ii) disallowing and expunging in its entirety the No Liability Claim identified on **Schedule 2** to the Proposed Order attached hereto; and upon the Holden Declaration; and the Court having found that it has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that venue of this proceeding and the Objection is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and upon consideration of the Objection and the Holden Declaration; and the Court having found and determined that the relief sought in the Objection is in the best interests of the Debtors and all

¹ The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. “v.a.” (5056). The Debtors’ (as defined herein) mailing addresses are c/o AlixPartners, Attn: William D. Holden, 909 Third Avenue, 30th Floor, New York, NY 10022.

² Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. The relief requested in the Objection is granted to the extent provided herein.
2. The Late Filed Claim identified on **Schedule 1** attached hereto is hereby disallowed and expunged in its entirety for the reasons set forth in the Objection.
3. The No Liability Claim identified on **Schedule 2** attached hereto is hereby disallowed and expunged in its entirety for the reasons set forth in the Objection.
4. Prime Clerk LLC, the Debtors' claims and noticing agent, is authorized to cause the Claims Register to be amended to reflect the terms of this Order.
5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
6. The Plan Administrator is authorized and empowered to take all actions as may be necessary and appropriate to implement the terms of this Order.
7. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2019
New York, New York

THE HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

Late Filed Claim

Claimant	Claim No.	Date Filed	Claimed Debtor	Claim Amount
Commonwealth of PA - UCTS	340	07/07/2017	Gawker Media, LLC	\$481.57

Schedule 2

No Liability Claim

Claimant	Claim No.	Date Filed	Claimed Debtor	Claim Amount
Michigan Department of Treasury	342	12/27/2017	Gawker Media, LLC	\$1,594.84